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May 28, 2025

VIA ECF

Honorable Renée Marie Bumb
United States District Court
Mitchell H. Cohen Building and
U.S. Courthouse
Courtroom 3D
4th and Cooper Streets
Camden, New Jersey 0810

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875 (D.N.J.)

Dear Chief Judge Bumb and Judge Vanaskie:

Please accept this letter on behalf of the Plaintiffs in advance of the May 30,
2025 case management conference.

**1. 30(b)(6) Deposition Regarding ZHP Certificates of Analysis, Material
Safety Data Sheets, and Related Documents.**

The Parties are continuing to meet and confer to schedule the 30(b)(6)
deposition on ZHP's certificates of analysis, material safety data sheets, and related
documents.

Honorable Renée Marie Bumb, U.S.D.J.
Honorable Thomas I. Vanaskie (Ret.)
May 28, 2025
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2. Wave 2 DFS Amendments.

The Parties are continuing to meet and confer regarding the Wave 2 DFS amendments. Specifically, the Parties are attempting to identify the quantities of ZHP API used to create Teva's finished dose lots, where Teva combined multiple lots of API to create a single finished dose lot. This information is necessary to determine the NDMA levels in Teva's FD product, which is highly relevant to Plaintiffs' expert witnesses and their reports. Should the parties be unable to reach agreement on this issue, Plaintiffs may require a 30(b)(6) corporate representative deposition.

3. CMO 38 Product ID Deficiencies.

Plaintiffs will be prepared to discuss this at the CMC.

4. PFS Deficiencies.

Plaintiffs will be ready to address this at the CMC.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)